

# TRAUB LIEBERMAN

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October 28, 2024

**VIA ECF**

*DOCUMENT FILED ELECTRONICALLY*

The Honorable Julien Xavier Neals, U.S.D.J.  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, NJ 07102

RE: Federal Trade Commission v. The FBA Machine Inc., et al  
Civil Action No.: 24-6635(JXN) (LDW)

Dear Judge Neals:


This firm has been retained by non-party, Zoeller Pump Company (“Zoeller”), in connection with the above-referenced Action. Zoeller Pump Company is a creditor of one of the Defendants, Daily Distro. As such, the outcome of this Action and/or its proceedings may affect Zoeller’s interests.

A Show Cause Hearing commenced on September 18, 2024. Prior to same, we obtained the consent of all parties to attend that hearing, and wrote to Your Honor requesting leave to attend. The continuation of that hearing is currently scheduled for October 30, 2024. Accordingly, Zoeller again, respectfully requests leave for its undersigned counsel to attend the continued hearing, solely for purposes of observing the proceedings.

Thank you for your courtesies and consideration.

Respectfully,

**TRAUB LIEBERMAN STRAUS & SHREWSBERRY LLP**

  
Laura M. Faustino

cc: ALL PARTIES OF RECORD (via ECF)  
Jessica Burnett, Esq. (via email)